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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re,

Case No. 25-50344-hlb

Perry L. Cisco,

Chapter 13

Debtor.

GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169
Phone: (702) 978-4249/ Fax: (945) 333-4256

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OBJECTION TO CONFIRMATION OF THE DEBTOR'S CHAPTER 13 PLAN
(Re: 9320 N. Virginia St., Reno, NV 89506)

COMES NOW, Propel Financial Services ("Secured Creditor"), by and through its undersigned attorney, objects to the confirmation of the Debtor's *Chapter 13 Plan* [DE 9] filed on April 15, 2025 (the "Plan") and, in support thereof, states as follows:

1. This Case commenced by the filing of a Chapter 13 Voluntary Petition on April 15, 2025.

2. The Debtor owns certain real property, located at 9320 N. Virginia St., Reno, NV 89506 (the "Property"), which is encumbered by a Property Tax Lien.

3. The Debtor is obligated to Secured Creditor pursuant to that Property Tax Lien and has filed its *Proof of Claim 2-1* which reflects a total debt of \$4,333.39 (the "Claim").

4. Pursuant to 11 U.S.C. § 1325(a)(5), the Court shall confirm the Plan if the holder of the Claim either has accepted the Plan or the Debtor surrenders the Property.

5. The Plan fails to provide for full payment of the secured claim in violation of the requirements of § 1325(a)(5).

6. Secured Creditor does not consent to the treatment of its Claim as proposed by the Plan. Accordingly, the Plan cannot be confirmed pursuant to 11 U.S.C. § 1325(a)(5)(A).

7. Secured Creditor seeks the award of bankruptcy fees and costs for having to file this Objection.

8. Secured Creditor reserves the right to file a supplemental objection.

WHEREFORE, Propel Financial Services files this Objection to Confirmation of the Debtor's *Chapter 13 Plan* [DE 9], moves the Court to deny confirmation of said Plan, award bankruptcy fees and costs, and for such further and other relief that the Court deems just and proper.

DATED this 7th day of May, 2025.

GREENSPOON MARDER LLP

By: /s/ Phillip A. Silvestri, Esq.
Phillip A. Silvestri, Esq.
Attorney for Creditor
3993 Howard Hughes Pkwy., #400
Las Vegas, NV 89169
Email address: phillip.silvestri@gmlaw.com

CERTIFICATE OF SERVICE

1. On May 7, 2025, I served the following documents:

OBJECTION TO CONFIRMATION OF PLAN.

2. I served, or caused to be served, the above-named document by the following means to the persons as listed below:

a. **ECF System**

Attorney for Debtor
SEAN P PATTERSON
232 COURT STREET
Reno, NV 89501

Trustee
WILLIAM A. VAN METER
POB 6630
RENO, NV 89513

b. United States mail, postage fully prepaid

Debtor
PERRY L. SISCO
9320 N. VIRGINIA ST.
RENO, NV 89506

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed on May 7, 2025

/s/ Phillip A. Silvestri, Esq.

Phillip A. Silvestri, Esq.

Employee of Greenspoon Marder LLP